

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 4:20-mj-01099-JMB
	)	
JERRELL WEST,	)	
	)	
Defendant.	)	

**MOTION FOR PRE-TRIAL DETENTION AND HEARING**

Comes now the United States of America, by and through its attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Dianna R. Collins, Assistant United States Attorney for said District, and moves the Court to order defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, Section 3141, et seq.

As and for its grounds, the Government states as follows:

1. The complaint alleges that the defendant, 31 year old male, traveled from Arkansas to Missouri to meet a 14 year old child and then transported that child to a truck stop for the purpose of engaging in sexual activity. This is an offense for which a maximum term of imprisonment of ten years or more is prescribed in Title 18, United States Code, Sections 2423, specifically an offense involving a minor victim, specifically, 2423(b) (Travel with intent to engage in criminal sexual activity).

2. The defendant is a threat to the community. The defendant's criminal history includes concerning sexual behavior. In 2016, he was arrested for charges involving indecent solicitation of a child in violation of 720 ILLS 5.0. The defendant ultimately pled guilty to the felony assault and aggravated battery charges connected with this event. Additionally, in 2015, the defendant was charged with a misdemeanor public indecency/lewd exposure in violation of 720 ILCS 5.0.

3. Accordingly, a rebuttable presumption arises pursuant to Title 18, United States Code, Section 3142(e)(3) that there are no conditions or combination of conditions which will reasonably assure the appearance of the defendant as required, and the safety of any other person and the community.

WHEREFORE, the Government requests this Court to order defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of defendant's initial appearance.

Respectfully submitted,

JEFFREY B. JENSEN  
United States Attorney

/s/ Dianna R. Collins

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